INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

October 29, 2003

TO: Interested Parties / Applicant

RE: Carrera Designs, Inc. / T039-17512-00326

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within thirty (30) days from the receipt of this notice** provided under IC 13-15-5-3. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTVOP.dot 8/11/03

PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Carrera Designs, Inc.
4201 Eastland Drive
Elkhart, Indiana 46516

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-17512-00326	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date:October 29, 2003 Expiration Date:October 29, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary custom recreational vehicle coating source.

Responsible Official:	President
Source Address:	4201 Eastland Drive, Elkhart, Indiana 46516
Mailing Address:	4201 Eastland Drive, Elkhart, Indiana 46516
General Source Phone Number:	(574) 295-7907
SIC Code:	7532
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This custom recreational vehicle coating source consists of two (2) plants:

(a) Plant 1 (EU-01) is located at 4201 Eastland Drive, Elkhart, Indiana 46516; and

(b) Plant 2 (EU-02) is located at 1101 Herman Street, Elkhart, Indiana 46516.

Since the two (2) plants are located on adjacent properties (275 meters apart), the two (2) plants operate in a series with each other, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, pursuant to Significant Source Modification (039-17227-00326), issued on June 10, 2003.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) The following facilities at Plant 1, identified as EU-01, constructed in 1984, for coating recreational vehicle slide out panels, with a capacity of ten (10) recreational vehicles per day:

(1) One (1) prep area, identified as Room A, using hand applicators and exhausting through stack F5;

(2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control and exhausting through stacks F1 through F4;

(3) One (1) final finish room, identified as Room C, equipped with high volume, low pressure (HVLP) spray applicators for base coat and clear coat application as needed for repairs and a dry filter for overspray control, exhausting through stack F6; and

(4) One (1) paint mix room, exhausting through stack F7.

(b) The following facilities at Plant 2, identified as EU-02, to be constructed, for coating the exterior of recreational vehicles, with a capacity of ten (10) recreational vehicles per day:

(1) One (1) prep area, identified as Room A, using hand applicators and exhausting through stacks S1 and S2;

(2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control, and exhausting through stacks S4 through S13; and

(3) One (1) paint mix and storage area, exhausting through stack S3.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21).

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) Four (4) heaters, identified as H1 through H4, with a maximum capacity of 0.125 million British thermal units per hour, each.

(2) One (1) air make-up unit, identified as A1, with a maximum capacity of 1.0 million British thermal units per hour.

(3) One (1) air make-up unit, identified as MA-4, with a maximum capacity of 2.4 million British thermal units per hour.

(4) Two (2) air make-up units, identified as MA-2 and MA-3, with a maximum capacity of 4.8 million British thermal units per hour, each.

(5) One (1) air make-up unit, identified as MA-1, with a maximum capacity of 1.375 million British thermal units per hour.

(6) One (1) hot water heater, identified as B1, with a maximum capacity of 0.1 million British thermal units per hour.

(7) Two (2) furnaces, identified as B2 and B3, with a maximum capacity of 0.09 million British thermal units per hour, each.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses

the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared

and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or

facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part

70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does

require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the

request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment for modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM,

OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2 and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2 and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2 and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2 and IC 13-30-3-1, utilize

any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification

requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected RACM increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos Inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the

"responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response

steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19(e)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

(1) Indicate estimated actual emissions of criteria pollutants from the source;

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Part 2 MACT Application Submittal Requirement

C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Surface Coating

(a) The following facilities at Plant 1, identified as EU-01, constructed in 1984, for coating recreational vehicle slide out panels, with a capacity of ten (10) recreational vehicles per day:

(1) One (1) prep area, identified as Room A, using hand applicators and exhausting through stack F5;

(2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control and exhausting through stacks F1 through F4;

(3) One (1) final finish room, identified as Room C, equipped with high volume, low pressure (HVLP) spray applicators for base coat and clear coat application as needed for repairs and a dry filter for overspray control, exhausting through stack F6; and

(4) One (1) paint mix room, exhausting through stack F7.

(b) The following facilities at Plant 2, identified as EU-02, to be constructed, for coating the exterior of recreational vehicles, with a capacity of ten (10) recreational vehicles per day:

(1) One (1) prep area, identified as Room A, using hand applicators and exhausting through stacks S1 and S2;

(2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control, and exhausting through stacks S4 through S13; and

(3) One (1) paint mix and storage area, exhausting through stack S3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), BACT for these facilities (EU-01 and EU-02) has been determined to be as follows pursuant to SSM 039-17227-00326, issued June 10, 2003.

(a) The total VOC usage in coatings and cleanup solvents used at the surface coating facilities shall be limited to no more than 243 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The VOC content of coatings used shall be limited as follows:

(1) primer: 6.1 lbs VOC / gallon of coating

(2) base coat: 5.9 lbs VOC / gallon of coating

(3) clear coat: 4.8 lbs VOC / gallon of coating

(c) The following best available control technology (BACT) workplace practices shall be implemented:

(1) All coatings will be applied with high volume, low pressure (HVLP) spray applicators or a spray applicator as efficient or more efficient than a high volume, low pressure spray applicator.

(2) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(3) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(4) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(5) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.

(6) Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.

(7) The application equipment operators shall be instructed and trained in the methods and practices utilized to minimize overspray emitted on the floor and into the air filters.

(8) Exteriors will be hand-wiped with a cleaning solvent prior to the application of the first coating.

D.1.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to SPM 039-17397-00326, issued on June 30, 2003 and 40 CFR 52 Subpart P, the PM from the painting operations at Plant 1 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to SPM 039-17397-00326, issued on June 30, 2003 and 326 IAC 6-3-2(d), particulate from the two (2) paint rooms, identified as Room B at each plant, and the one (1) final finish room, identified as Room C at Plant 1, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by using formulation data supplied by the coating manufacturer. For any coating subject to the limitations in Condition D.1.1, if they are not "as supplied", records need to be maintained to demonstrate that the "as applied" coatings are compliant. IDEM, OAQ, reserves the authority to determine compliance

using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the two (2) paint rooms, identified as Room B at each plant, and the one (1) final finish room, identified as Room C at Plant 1, stacks (F1 through F4, F6 and S4 through S13) while one or more of the coating processes is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emissions is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Carrera Designs, Inc.
Source Address: 4201 Eastland Drive, Elkhart, Indiana 46516
Mailing Address: 4201 Eastland Drive, Elkhart, Indiana 46516
Part 70 Permit No.: T039-17512-00326

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Carrera Designs, Inc.
Source Address: 4201 Eastland Drive, Elkhart, Indiana 46516
Mailing Address: 4201 Eastland Drive, Elkhart, Indiana 46516
Part 70 Permit No.: T039-17512-00326

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Carrera Designs, Inc.
Source Address: 4201 Eastland Drive, Elkhart, Indiana 46516
Mailing Address: 4201 Eastland Drive, Elkhart, Indiana 46516
Part 70 Permit No.: T039-17512-00326
Facility: Coating facilities at Plants 1 and 2 (EU-01 and EU-02)
Parameter: Total VOC usage
Limit: 243 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Carrera Designs, Inc.
Source Address: 4201 Eastland Drive, Elkhart, Indiana 46516
Mailing Address: 4201 Eastland Drive, Elkhart, Indiana 46516
Part 70 Permit No.: T039-17512-00326

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit Renewal

Source Name: Carrera Designs, Inc.
Source Location: 4201 Eastland Drive, Elkhart, Indiana 46516
County: Elkhart
SIC Code: 7532
Operation Permit No.: T039-17512-00326
Permit Reviewer: Amy Cook

On August 27, 2003, the Office of Air Quality (OAQ) had a notice published in The Truth, Elkhart, Indiana, stating that Carrera Designs, Inc. had applied for a Part 70 Operating Permit to operate a custom recreational vehicle coating source. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 26, 2003, the OAQ received comments from the source. If revisions to the permit are required, bolded language shall indicate language that has been added, language with a line through it has been deleted. The Table of Contents has been revised as needed.

Comment 1:
Condition B.10(a), page 7 of 33: Preventive Maintenance Plans are only required for control equipment. Therefore, the word “facility” at the end of this condition should be deleted and replaced with the phrase “emission control device”.

Response to Comment 1:
IDEM, OAQ disagrees: Preventive Maintenance Plans are required for the facility and the emission control device to insure the emission limits are continuously met and emissions are minimized. 326 IAC 1-6-3 specifies what information should be included in the preventive maintenance plan, but its purpose is not to determine applicability as is 326 IAC 1-6-1. Pursuant to 326 IAC 1-6-1, 326 IAC 1-6 applies to the owner or operator of any facility required to obtain a permit. In addition, 326 IAC 1-6-5 provides that the commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment. Therefore, no change will be made to Condition B.10(a).

Comment 2:
Condition B.10(c), page 8 of 33: The second sentence in this condition should be deleted because it allows IDEM to order the Permittee to revise a Preventive Maintenance Plan in certain circumstances and the circumstances identified in this condition are not specified in the underlying regulations. Therefore, this sentence exceeds the requirements of 326 IAC 2-7-5(1), (3) and (13), 326 IAC 2-7-6(1) and (6), and 326 IAC 1-6-3.

Response to Comment 2:
IDEM, OAQ disagrees: Under 326 IAC 2-7-5(1), IDEM, OAQ does have the authority to include requirements that assure compliance with all applicable requirements. If an exceedance has occurred, IDEM, OAQ may determine it necessary for the Permittee to revise its PMP in order to prevent another

exceedance. Therefore, no change will be made to Condition B.10(c).

Comment 3:
Conditions B.11(h), B.14(a), and the Part 70 Operating Permit Quarterly Deviation and Compliance Monitoring Report, pages 9, 11, and 32 of 33: These conditions and the report require quarterly filing of deviation and compliance monitoring reports. The underlying regulation, 326 IAC 2-7-5(3)(C)(i) requires the submission of monitoring reports no less frequently than semi-annually. Carrera sees no reason to require the submission of reports more frequently than semi-annually as contemplated by the underlying regulation and IDEM has not provided any rational why more frequent reporting is necessary. Therefore, these conditions and this report should be revised by deleting the word "Quarterly" and replacing it with the phrase "Semi-annual".

Response to Comment 3:
IDEM, OAQ disagrees: In the past, IDEM, OAQ required deviations within ten (10) days of the deviation occurring. It was determined that as long as deviations were reported quarterly it was not necessary to report within the ten (10) days. IDEM, OAQ believes that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance. Therefore, no change will be made to Conditions B.11(h), B.14(a) and the Part 70 Operating Permit Quarterly Deviation and Compliance Monitoring Report.

Comment 4:
Condition B.21(e), pages 14 and 15 of 33: Condition B.21(e) should be deleted because it is not one of the listed authorizations in 326 IAC 2-7-6(2) or the referenced statutes and exceeds the authority granted by that rule and those statutes.

Response to Comment 4:
IDEM, OAQ disagrees: In addition to the right to entry, IC 13-14-2-2 and 326 IAC 2-7-6(2) gives IDEM, OAQ the authority to inspect; as part of an inspection it may be necessary to use equipment to document the conditions in order to assure compliance with an applicable requirement and this permit. Therefore, no change will be made to Condition B.21(e).

Comment 5:
Condition C.1(a), page 16 of 33: This condition incorrectly states the applicable requirements of the version of 326 IAC 6-3 that was incorporated into 40 CFR 52, Subpart P. The version of 326 IAC 6-3 that was incorporated into 40 CFR 52, Subpart P, does not specify the appropriate emission rate for processes with a process weight rate of less than 100 pounds per hour. Therefore, stating 40 CFR 52, Subpart P, requires processes with a process weight rate of less than 100 pounds per hour to comply with an emission rate of 0.551 pounds per hour is incorrect. This condition should be revised to accurately reflect the requirements contained in 40 CFR 52, Subpart P, or be deleted.

Response to Comment 5:
IDEM, OAQ disagrees: Pursuant to 40 CFR 52, Subpart P, the table's lowest listed process weight rate is one hundred (100) pounds per hour, and its allowable emission rate is 0.551 pounds per hour. Emission limitations for process weights of less than one hundred (100) pounds per hour are not specifically identified in the table, but are not exempted from the rule. Emissions from processes less than one hundred (100) pounds per hour can still be considered. In 2002, the Indiana Air Pollution Control Board amended 326 IAC 6-3 to make clear that sources with process weight levels below one hundred (100) pounds per hour shall limit their particulate emissions to 0.551 pounds per hour. Therefore, no change will be made to Condition C.1(a).

Comment 6:
Condition C.6, page 16 of 33: This condition should be revised because it fails to require the use of air pollution control equipment only if the emission unit is venting to the atmosphere. Therefore, this condition should be revised by adding the phrase "and venting to the atmosphere" at the end of this condition.

Response to Comment 6:
IDEM, OAQ disagrees: The control device shall be operated at all times the emission unit is operating. In addition, exhausting into the building does not assure that no particulate matter (PM) will be emitted into the atmosphere due to the opening of windows and/or doors. Therefore, no change will be made to Condition C.6.

Comment 7:
Condition C.7(b)(1), page 17 of 33: This condition should be revised because, unlike the underlying regulation, 326 IAC 14-10-3(1)(A), it does not limit the types of asbestos subject to the update notification requirements to RACM. Therefore, this condition should be revised by deleting the phrase "asbestos containing material" and replacing it with the phrase "RACM" to be consistent with the underlying regulation.

Response to Comment 7:
IDEM, OAQ agrees: 326 IAC 14-10-3(1)(A) does specify RACM. Therefore, Condition C.7(b)(1) has been revised as follows:

> (1) When the amount of affected ~~asbestos containing material~~ **RACM** increases or decreases by at least twenty percent (20%); or

Comment 8:
Condition C.14, pages 19-21 of 33: This condition should be deleted because neither 326 IAC 2-7-5 or 326 IAC 2-7-6 authorize a "Compliance Response Plan". In addition, the condition fails to recognize that a compliance response plan does not have to be an entirely new document. To the extent a compliance response plan is necessary, the plan should be able to reference information contained in other documents.

Response to Comment 8:
IDEM, OAQ disagrees: IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language. The plans are fully supported by rules promulgated by the Air Pollution Control Board. 326 IAC 2-7-5(1) requires that all Title V permits contain operational requirements and limitations that assure compliance with all applicable requirements. 326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. 326 IAC 2-7-5(3)(A)(ii) requires that, at a minimum, the periodic monitoring requirements must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance, even where the applicable requirement does not require periodic testing or instrumental monitoring. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled “Preventive Maintenance Plan.” The Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. Response maintenance included inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an “out of specification situation”, and set the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the equipment to prevent an exceedance of an emission limit or violation of other permit requirements.

After issuing the first draft Title V permits in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was to remove the corrective action and related schedule requirements from the PMP requirement and placed them into some other requirement. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring.

IDEM agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps."

The CRP response steps and schedule requirements are examples of documenting procedures developed from good business practices and the prevention of environmental problems. Permittees already have maintenance schedules and trouble shooting guides that specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

In addition, the Permittee needs to have a document considered a “Compliance Response Plan”; however, the Permittee can reference information contained in other documents within this CRP.

Therefore, no change will be made to Condition C.14.

Comment 9:
Condition C.18(a), page 22 of 33: This condition requires the quarterly submission of deviation and compliance monitoring reports. The underlying regulation, 326 IAC 2-7-5(3)(C)(i) requires the submission of monitoring reports no less frequently than semi-annually. Carrera sees no reason to require the submission of reports more frequently than semi-annually as contemplated by the underlying regulation and IDEM has not provided any rational why more frequent reporting is necessary. In addition, this condition requires the report to be submitted within thirty (30) days of the end of the reporting period. This time period is not specified in the underlying regulations and may be an insufficient amount of time to prepare and file the report. Therefore, the word “Quarterly” should be deleted and replaced with the phrase “Semi-annual” and the phrase “thirty (30)” should be deleted and

replaced with the phrase “sixty (60)”.

Response to Comment 9:
IDEM, OAQ disagrees: In the past, IDEM, OAQ required deviations within ten (10) days of the deviation occurring. It was determined that as long as deviations were reported quarterly it was not necessary to report within the ten (10) days. IDEM, OAQ believes that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance. IDEM, OAQ has determined that thirty (30) days after the reporting period is sufficient time to submit a report. Therefore, no change will be made to Condition C.18(a).

Comment 10:
Condition C.18(d), page 22 of 33: This condition requires all reports to be submitted within thirty (30) days of the end of the reporting period unless otherwise specified in the permit. This time period is not specified in the underlying regulations and may be an insufficient amount of time to prepare and file reports. Therefore, the phrase “thirty (30)” should be deleted and replaced with the phrase “sixty (60)”.

Response to Comment 10:
IDEM, OAQ disagrees: IDEM, OAQ has determined that thirty (30) days after the reporting period is sufficient time to submit a report. Therefore, no change will be made to Condition C.18(d).

Comment 11:
Condition D.1.1(a), page 24 of 33: should be changed to allow for deduction of waste shipped off site. Following is suggested language: The total VOC usage in coatings and cleanup solvents used at the surface coating facilities **minus used VOC solvent shipped off site** shall be limited to no more than 243 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Response to Comment 11:
IDEM, OAQ disagrees: This language is from an existing BACT determination pursuant to SSM 039-17227-00326, issued on June 10, 2003. In order for any changes to be made to this BACT, the Permittee must request a new BACT analysis. Therefore, no change will be made to Condition D.1.1(a).

Comment 12:
The language in Condition D.1.1(c)(8), page 25 of 33: should be changed to **“When cleaning** exteriors ~~will be hand-wiped~~ with a cleaning solvent prior to the application of the first coating **hand-wiping will be utilized**”.

Response to Comment 12:
IDEM, OAQ disagrees: This language is from an existing BACT determination pursuant to SSM 039-17227-00326, issued on June 10, 2003. In order for any changes to be made to this BACT, the Permittee must request a new BACT analysis. Therefore, no change will be made to Condition D.1.1(c)(8).

Comment 13:
The Preventive Maintenance Plan in D.1.4, page 25 of 33: should be required for any control device and not include “the facility” in this requirement.

Response to Comment 13:
IDEM, OAQ disagrees: Preventive Maintenance Plans are required for the facility and the emission control device to insure the emission limits are continuously met and emissions are minimized. 326 IAC 1-6-3 specifies what information should be included in the preventive maintenance plan, but its purpose

is not to determine applicability as is 326 IAC 1-6-1. Pursuant to 326 IAC 1-6-1, 326 IAC 1-6 applies to the owner or operator of any facility required to obtain a permit. In addition, 326 IAC 1-6-5 provides that the commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment. Therefore, no change will be made to Condition D.1.4.

Comment 14:
Conditions D.1.6(a) and (b), page 26 of 33: Because neither 326 IAC 2-7-5 nor 326 IAC 2-7-6 authorize a "Compliance Response Plan" as discussed above, the last two sentences in Condition D.1.6(a) and the last three sentences in D.1.6(b) should be deleted.

Response to Comment 14:
IDEM, OAQ disagrees: Refer to the response to Comment # 8.

Therefore, no change will be made to Condition D.1.6(a) and (b).

Comment 15:
Condition D.1.7(a), page 26 of 33: This condition requires the availability of records to demonstrate compliance within thirty (30) days of the end of each compliance period. This time period is not specified in the underlying regulations and may be an insufficient amount of time to make these records available. Therefore, the phrase "thirty (30)" should be deleted and replaced with the phrase "sixty (60)".

Response to Comment 15:
IDEM, OAQ disagrees: IDEM, OAQ has determined that thirty (30) days after the reporting period is sufficient time to submit a report. Therefore, no change will be made to Condition D.1.7(a).

Comment 16:
Condition D.1.8, page 27 of 33: This condition requires the submission of quarterly summary reports within thirty (30) days after the end of the reporting period. Neither the submission frequency or time period in which to submit the report are specified in the underlying regulations. Therefore, this condition should be revised by deleting the word "quarterly" and replacing it with the phrase "semi-annual". In addition, the phrase "thirty (30)" should be deleted and replaced with the phrase "sixty (60)".

Response to Comment 16:
IDEM, OAQ disagrees: In the past, IDEM, OAQ required deviations within ten (10) days of the deviation occurring. It was determined that as long as deviations were reported quarterly it was not necessary to report within the ten (10) days. IDEM, OAQ believes that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance. IDEM, OAQ has determined that thirty (30) days after the reporting period is sufficient time to submit a report. Therefore, no change will be made to Condition D.1.8.

Comment 17:
Part 70 Quarterly Report, page 31 of 33: The underlying regulation, 326 IAC 2-7-5(3)(C)(i) requires the submission of monitoring reports no less frequently than semi-annually. Carrera sees no reason to require the submission of reports more frequently than semi-annually as contemplated by the underlying regulation and IDEM has not provided any rational why more frequent reporting is necessary. Therefore, the word "Quarterly" should be deleted and replace it with the phrase "Semi-annual".

Response to Comment 17:
IDEM, OAQ disagrees: In the past IDEM, OAQ required deviations within ten (10) days of the deviation occurring, it was determined that as long as they were reported quarterly it was not necessary to report

within the ten (10) days. IDEM, OAQ believes that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance. Therefore, no change will be made to the Part 70 Quarterly Report.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Condition C.14(b)(3) (Compliance Response Plan - Preparation, Implementation, Records and Reports) has been revised. This notification requirement has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide the OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements.

   Condition C.14(b)(3) has been revised as follows:

   ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.~~

   (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name: Carrera Designs, Inc.
Source Location: 4201 Eastland Drive, Elkhart, Indiana 46516
County: Elkhart
SIC Code: 7532
Operation Permit No.: T039-17512-00326
Permit Reviewer: Amy Cook

The Office of Air Quality (OAQ) has reviewed a Part 70 permit renewal application from Carrera Designs, Inc. relating to the operation of a custom recreational vehicle coating source. The coating is performed primarily on fiberglass/reinforced plastics.

Source Definition

This custom recreational vehicle coating source consists of two (2) plants:

(a) Plant 1 (EU-01) is located at 4201 Eastland Drive, Elkhart, Indiana 46516; and

(b) Plant 2 (EU-02) is located at 1101 Herman Street, Elkhart, Indiana 46516.

Since the two (2) plants are located on adjacent properties (275 meters apart), the two (2) plants operate in a series with each other, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) The following facilities at Plant 1, identified as EU-01, constructed in 1984, for coating recreational vehicle slide out panels, with a capacity of ten (10) recreational vehicles per day:

(1) One (1) prep area, identified as Room A, using hand applicators and exhausting through stack F5;

(2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control and exhausting through stacks F1 through F4;

(3) One (1) final finish room, identified as Room C, equipped with high volume, low pressure (HVLP) spray applicators for base coat and clear coat application as needed for repairs and a dry filter for overspray control, exhausting through stack

F6; and

(4) One (1) paint mix room, exhausting through stack F7.

(b) The following facilities at Plant 2, identified as EU-02, to be constructed, for coating the exterior of recreational vehicles, with a capacity of ten (10) recreational vehicles per day:

(1) One (1) prep area, identified as Room A, using hand applicators and exhausting through stacks S1 and S2;

(2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control, and exhausting through stacks S4 through S13; and

(3) One (1) paint mix and storage area, exhausting through stack S3.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) Four (4) heaters, identified as H1 through H4, with a maximum capacity of 0.125 million British thermal units per hour, each.

(2) One (1) air make-up unit, identified as A1, with a maximum capacity of 1.0 million British thermal units per hour.

(3) One (1) air make-up unit, identified as MA-4, with a maximum capacity of 2.4 million British thermal units per hour.

(4) Two (2) air make-up units, identified as MA-2 and MA-3, with a maximum capacity of 4.8 million British thermal units per hour, each.

(5) One (1) air make-up unit, identified as MA-1, with a maximum capacity of 1.375 million British thermal units per hour.

(6) One (1) hot water heater, identified as B1, with a maximum capacity of 0.1 million British thermal units per hour.

(7) Two (2) furnaces, identified as B2 and B3, with a maximum capacity of 0.09 million British thermal units per hour, each.

(b) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa, 15 mm Hg, or 0.3 psi measured at 38 degrees C (100 degrees F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa, 5 mm Hg, or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(c) Purging of gas lines and vessels that is related to routine maintenance and repair of

buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(d) On-site fire and emergency response training approved by the department.

(e) Paved roads.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) R 039-00326, issued on December 26, 1984;

(a) T 039-7512-00326, issued on December 31, 1998;

(b) 039-10677-00326, issued on April 5, 1999; and

(c) 039-13217-00326, issued on November 27, 2001

(d) SSM 039-17227-00326, issued on June 10, 2003; and

(e) SPM 039-17397-00326, issued on June 30, 2003

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) R 039-00326, issued on December 26, 1984

Reason not incorporated: Only the VOC emission limit of 24.9 tons per year has been removed.

This source received a registration in 1984 based on a VOC emission limit of 24.9 tons per year. The capacity of the source has not changed. The source should of been issued a Construction Permit based on the potential VOC emissions. The registration is still a valid air approval, based on the review procedure in 1984. This review will correct the type of approval that is proper for the source. However, a Best Available Control Technology (BACT) analysis has been included pursuant to SSM 039-17227-00326, issued on June 10, 2003. The VOC emission limit of 24.9 tons per year has been removed.

(b) T 039-7512-00326, issued on December 31, 1998; SSM 039-17227-00326, issued on June 10, 2003; and SPM 039-17397-00326, issued on June 30, 2003.

Condition A.1: SIC Code 3711

Reason not incorporated: SIC Code 3711 has been removed and replaced with SIC Code 7532. SIC Code 3711 applies to motor vehicle and passenger car body manufacturing. Carrera Designs Inc does not manufacturer motor vehicles or passenger car bodies, it applies surface coating. SIC Code 7532 pertains to top and body repair and paint shops, therefore SIC Code 7532 has replaced SIC Code 3711.

(c) T 039-7512-00326, issued on December 31, 1998; SSM 039-17227-00326, issued on June 10, 2003; and SPM 039-17397-00326, issued on June 30, 2003.

Conditions B.1 and B.15

Reason not incorporated:
Condition B.1 (Permit no Defense) [326 IAC 2-1-10] [IC 13] Permit no Defense has been deleted from Section B because most of the language from this condition has been

incorporated into the Permit Shield Condition [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12] in Section B of the Part 70 Operating Permit.

Condition B.15 (Multiple Exceedances) [326 IAC 2-7-5(1)(E)] Multiple Exceedances has been deleted from Section B because 326 IAC 2-7-5(1)(E) has been repealed, becuase it conflicted with 40 CFR 70.6(a)(6).

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on January 21, 2003. Additional information was submitted on April 8, 2003.

A notice of completeness letter was mailed to the source on April 2, 2003.

Emission Calculations

See pages 1 through 4 of Appendix A of this document for detailed emissions calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous Part 70 Operating Permit.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	14.23
PM-10	14.60
SO_2	0.040
VOC	243
CO	5.54
NO_x	6.60

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/year)
MEK	25.5
MIBK	18.2
Toluene	96.9
Xylene	35.6
Chromium Compounds	0.244
Glycol Ethers	21.5
Ethylbenzene	20.8
HDI	0.001
Phosphorus	0.062
Methanol	0.929

Methyl chloroform, Dichloromethane, Tetrachloroethylene or Trichlorotrifluoroethane	0.320
Benzene	0.0001
Dichlorobenzene	0.0001
Formaldehyde	0.0050
Hexane	0.1188
Lead	0.00003
Cadmium	0.0001
Manganese	0.00003
Nickel	0.0001
TOTAL	220.18

(a) The unrestricted potential emissions of volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential emissions of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data. There are no HAP emissions on file at the OAQ for this source.

Pollutant	Actual Emissions (tons/year)
PM	0.26
PM-10	0.26
SO2	0.001
VOC	37.80
CO	0.03
NOx	0.15
HAPs	N/A

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Custom recreational vehicle coating source (Plants EU-01 and EU-02)	14.23	14.60	0.040	243	5.54	6.60	220.18
Total Emissions	14.23	14.60	0.040	243	5.54	6.60	220.18

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Elkhart County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This source does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1:

(1) with the potential to emit before controls equal to or greater than the major source threshold;

(2) that is subject to an emission limitation or standard; and

(3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

(b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (ie. the source has the potential to emit ten (10) tons per year or greater of a single HAP or twenty-five (25) tons per year or greater of a combination HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

(1) This rule requires the source to:

(A) Submit a Part 1 MACT Application by May 15, 2002; and

(B) Submit a Part 2 MACT Application for each affected source category in accordance with the appropriate Part 2 MACT Application deadline listed in Table 1 in 40 CFR 63, Subpart B for the affected source category.

(2) The Permittee submitted a Part 1 MACT Application on May 15, 2002.

(3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A . Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:

(A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or

(B) If less than three years remain on the Part 70 permit term at the time the

MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or

(C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options with be followed.

(d) Sections 63.5785(b) and 63.5790(c) of the final MACT for the Reinforced Plastic Composites Production source category exempt a facility from the MACT if the facility only repairs reinforced plastic composites that the facility did not manufacture. Since Carrera Designs, Inc. does not manufacture reinforced plastic composites and only occasionally performs repair work on the fiberglass reinforced plastic composite parts of pre-manufactured recreational vehicles, Carrera Designs, Inc. will not be subject to the MACT for Reinforced Plastic Composites Production.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source was constructed after 1977 and is not one of the 28 listed source categories. The total source-wide potential to emit (PTE) of all criteria pollutants is less than two hundred (250) tons per year. Therefore, the source is not a major source and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) is not applicable.

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on April 8, 2003. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-4.1-1 (New Source Toxics Control)

There are no new facilities with emissions greater than major thresholds for HAPs (ten (10) tons per year for a single HAP and twenty-five (25) tons per year for combination HAPs) and constructed after July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

State Rule Applicability - Individual Facilities

326 IAC 8-2-9 (Miscellaneous Metal Coating)

This rule does not apply to this source because the source's SIC Code (7532) does not fall under any of the SIC Code categories listed in 326 IAC 8-2-9(a)(5).

40 CFR 52 Subpart P (Particulate Matter (PM))

(a) Pursuant to SPM 039-17397-00326, issued on June 30, 2003 and 40 CFR 52, Subpart P, the PM from the painting operations at Plant 1 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) The two (2) prep areas, identified as Room A at each plant, do not have the potential to emit PM. Therefore, the prep areas are not subject to the requirements of 40 CFR 52 Subpart P, Particulate Matter (PM).

326 IAC 6-3-2(d) (Particulate)

Pursuant to SPM 039-17397-00326, issued on June 30, 2003 and 326 IAC 6-3-2(d), particulate from the two (2) paint rooms, identified as Room B at each plant, and the one (1) final finish room, identified as Room C at Plant 1, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements (BACT))

The Best Available Control Technology (BACT) for these facilities (EU-01 and EU-02) has been determined to be as follows pursuant to SSM 039-17227-00326, issued on June 10, 2003.

(a) The total VOC usage in coatings and cleanup solvents used at the surface coating facilities shall be limited to no more than 243 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The VOC content of coatings used shall be limited as follows:

(1) primer: 6.1 lbs VOC / gallon of coating

(2) base coat: 5.9 lbs VOC / gallon of coating

(3) clear coat: 4.8 lbs VOC / gallon of coating

(c) The following best available control technology (BACT) workplace practices shall be implemented:

(1) All coatings will be applied using high volume, low pressure (HVLP) spray applicators or a spray applicator as efficient or more efficient than a high volume, low pressure spray applicator.

(2) The spray guns used shall be the type that can be cleaned without the need for

spraying the solvent into the air.

(3) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(4) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(5) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.

(6) Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.

(7) The application equipment operators shall be instructed and trained in the methods and practices utilized to minimize overspray emitted on the floor and into the air filters.

(8) Exteriors will be hand-wiped with a cleaning solvent prior to the application of the first coating.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The two (2) paint rooms, identified as Room B at each plant, and the one (1) final finish room, identified as Room C at Plant 1, which are spray coating operations, have applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the two (2) paint rooms, identified as Room B at each plant, and the one (1) final finish room, identified as Room C at Plant 1, stacks (F1 through F4, F6 and S4 through S13) while one or more of the coating processes is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be

considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions form the stack and the presence of overspray on the rooftops and nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emissions is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for overspray control must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this custom recreational vehicle coating source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-17512-00326.**

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Carrera Designs, Inc.
Address City IN Zip: 4201 Eastland Drive, Elkhart, IN 46516
Part 70 Renewal: T 039-17512-00326
Plt ID: 039-00326
Reviewer: Amy Cook
Date: July 24, 2003

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Material (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	Particulate Potential (tons/yr)	VOC solids (lbs/gal)	Transfer Efficiency	Material Substrate
Plant 1																	
Room A - Stack F5																	
Paint Prep																	
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.5%	20.0%	0.00%	0.22300	0.420	7.31	5.84	0.55	13.14	2.40	0.00	n/a	100%	Fiberglass Reinforced Plastics
Rooms B and C - Stacks F1, F2, F3 & F4																	Fiberglass Reinforced Plastics
Sealer (S64)	6.86	90.52%	53.0%	37.5%	55.1%	4.64%	0.18750	0.420	5.73	2.57	0.20	4.86	0.89	0.06	55.47	75%	Fiberglass Reinforced Plastics
Basecoat																	
Basecoat/White Toner	10.35	50.89%	0.0%	50.89%	0.0%	50.0%	0.27	0.420	5.27	5.27	0.60	14	2.6	0.6	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.55	0.420	7.31	5.84	1.34	32	5.9	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S White Basecoat	8.23	79.41%	10.74%	68.67%	13.4%	16.7%	0.82	0.420	6.52	5.65	1.9	47	8.5	0.6	n/a	75%	Fiberglass Reinforced Plastics
Basecoat/Metallic Toner	7.91	74.83%	0.0%	74.83%	0.0%	50.0%	0.46	0.420	5.92	5.92	1.15	28	5.0	0.4	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.46	0.420	7.31	5.84	1.13	27	5.0	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Metallic Basecoat	7.54	86.80%	8.79%	78.01%	10.0%	25.0%	0.92	0.420	6.54	5.88	2.3	55	10.0	0.4	n/a	75%	Fiberglass Reinforced Plastics
Tints																	
Graphics/Toner	7.91	74.83%	0.0%	74.83%	0.0%	50.0%	0.29	0.420	5.92	5.92	0.72	17	3.1	0.3	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.29	0.420	7.31	5.84	0.71	17	3.1	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Tint	7.54	86.80%	8.79%	78.01%	10.0%	25.0%	0.58	0.420	6.54	5.88	1.4	34	6.2	0.3	n/a	75%	Fiberglass Reinforced Plastics
Clearcoat																	
Clearcoat (CC633)	7.88	49.37%	0.0%	49.37%	0.0%	40.4%	0.46	0.420	3.89	3.89	0.75	18	3.3	0.8	n/a	75%	Fiberglass Reinforced Plastics
Activator (Hardner) (MCR75)	7.20	95.83%	0.0%	95.83%	0.0%	5.0%	0.12	0.420	6.90	6.90	0.33	8	1.5	0.0	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.17	0.420	7.31	5.84	0.42	10	1.9	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Clearcoat	7.61	67.14%	4.02%	63.12%	4.6%	25.6%	0.75	0.420	5.04	4.80	1.5	36	6.6	0.9	n/a	75%	Fiberglass Reinforced Plastics
Cleaners																	
Safety-Kleen Heavy Duty (6782)	7.01	100.00%	0.0%	100.0%	0.0%	0.00%	2.08600	0.250	7.01	7.01	3.66	87.74	16.01	0.00	n/a	100%	Fiberglass Reinforced Plastics
Clearcoat Gun Cleaner (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.29800	0.250	7.31	5.84	0.44	10.45	1.91	0.00	n/a	100%	Fiberglass Reinforced Plastics
Plant 2																	
Room A - Stacks S1 & S2																	
Paint Prep																	
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	1.26540	0.420	7.31	5.84	3.11	74.54	13.60	0.00	n/a	100%	Fiberglass Reinforced Plastics
Primer																	
Primer (P50)	13.53	28.23%	0.0%	28.23%	0.0%	42.1%	0.33	0.420	3.82	3.82	0.53	13	2.3	1.5	n/a	75%	Fiberglass Reinforced Plastics
Reducer (AS8)	7.06	99.58%	0.0%	99.58%	0.0%	0.5%	0.08	0.420	7.03	7.03	0.25	6	1.1	0.0	n/a	75%	Fiberglass Reinforced Plastics
Hardener (UH200)	8.25	52.85%	0.0%	52.85%	0.0%	45.0%	0.08	0.420	4.36	4.36	0.15	4	0.7	0.1	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Primer A	11.57	38.41%	0.00%	38.41%	0.0%	35.7%	0.50	0.420	4.44	4.44	0.9	22	4.1	1.6	n/a	75%	Fiberglass Reinforced Plastics
Etching (E2G980)	8.84	61.20%	0.0%	61.20%	0.0%	21.5%	0.25	0.420	5.41	5.41	0.57	14	2.5	0.4	n/a	75%	Fiberglass Reinforced Plastics
Reducer (R7K981)	6.76	97.49%	2.0%	95.49%	1.6%	0.5%	0.25	0.420	6.56	6.46	0.68	16	3.0	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Primer B	7.80	76.93%	0.87%	76.06%	0.8%	11.0%	0.50	0.420	5.98	5.93	1.2	30	5.5	0.4	n/a	75%	Fiberglass Reinforced Plastics
Primer C (CS105/S59) - can be used with B	11.24	32.47%	0.0%	32.5%	0.0%	31.00%	0.12500	0.420	3.65	3.65	0.19	4.60	0.84	0.44	11.77	75%	Fiberglass Reinforced Plastics
Room B - Stacks S3 through S13																	
Sealer (S64)	6.86	90.52%	53.0%	37.5%	55.1%	4.64%	0.81250	0.420	5.73	2.57	0.88	21.08	3.85	0.24	55.47	75%	Fiberglass Reinforced Plastics
Basecoat																	
Basecoat/White Toner	10.35	50.89%	0.0%	50.89%	0.0%	50.0%	1.73	0.420	5.27	5.27	3.82	92	16.7	4.0	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	3.45	0.420	7.31	5.84	8.48	204	37.1	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S White Basecoat	8.23	79.41%	10.74%	68.67%	13.4%	16.7%	5.18	0.420	6.52	5.65	12.3	295	53.9	4.0	n/a	75%	Fiberglass Reinforced Plastics
Basecoat/Metallic Toner	7.91	74.83%	0.0%	74.83%	0.0%	50.0%	3.54	0.420	5.92	5.92	8.80	211	38.5	3.2	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	3.54	0.420	7.31	5.84	8.69	208	38.0	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Metallic Basecoat	7.54	86.80%	8.79%	78.01%	10.0%	25.0%	7.08	0.420	6.54	5.88	17.5	420	76.6	3.2	n/a	75%	Fiberglass Reinforced Plastics
Tints																	
Graphics/Toner	7.91	74.83%	0.0%	74.83%	0.0%	50.0%	2.21	0.420	5.92	5.92	5.50	132	24.1	2.0	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	2.21	0.420	7.31	5.84	5.43	130	23.8	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Tint	7.54	86.80%	8.79%	78.01%	10.0%	25.0%	4.42	0.420	6.54	5.88	10.9	262	47.9	2.0	n/a	75%	Fiberglass Reinforced Plastics
Clearcoat																	
Clearcoat (CC633)	7.88	49.37%	0.0%	49.37%	0.0%	40.4%	2.31	0.420	3.89	3.89	3.77	90	16.5	4.2	n/a	75%	Fiberglass Reinforced Plastics
Activator (Hardner) (MCR75)	7.20	95.83%	0.0%	95.83%	0.0%	5.0%	0.58	0.420	6.90	6.90	1.67	40	7.3	0.1	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.87	0.420	7.31	5.84	2.12	51	9.3	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Clearcoat	7.61	67.14%	4.02%	63.12%	4.6%	25.6%	3.75	0.420	5.04	4.80	7.6	182	33.1	4.3	n/a	75%	Fiberglass Reinforced Plastics
Cleaners																	
Safety-Kleen Heavy Duty (6782)	7.01	100.00%	0.0%	100.0%	0.0%	0.00%	2.08600	0.250	7.01	7.01	3.66	87.74	16.01	0.00	n/a	100%	Fiberglass Reinforced Plastics
Clearcoat Gun Cleaner (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.29800	0.250	7.31	5.84	0.44	10.45	1.91	0.00	n/a	100%	Fiberglass Reinforced Plastics
State Potential Emissions			**Add worst case coating to all solvents**							**TOTALS:**	**55.5**	**1333**	**243**	**14.1**			
										Control Efficiency:	**0.00%**	**0.00%**	**0.00%**	**99.84%**			
										Potential after Control:	**55.5**	**1333**	**243**	**0.023**			

Note: The number listed under weight % water and volume % water is actually the weight % acetone and volume % acetone, which is not a VOC, for all maerial except Reducer R7K981, which contains water.

Particulate (lbs/hr) before controls:	**3.21**
Particulate (lbs/hr) after controls:	**0.005**

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

METHODOLOGY for Two Materials RTS

RTS Density (lbs/gal) = ((Da*Va)+(Db*Vb))/(Va+Vb)
RTS Weight % H2O + Organics = ((Wa*Da*Va)+(Wb*Db*Vb))/((Da*Va)+(Db*Vb))

METHODOLOGY for three materials RTS

RTS Density (lbs/gal) = ((Da*Va)+(Db*Vb)+(Dc*Vc))/(Va+Vb+Vc)
RTS Weight % H2O + Organics = ((Wa*Da*Va)+(Wb*Db*Vb)+(Wc*Dc*Vc))/((Da*Va)+(Db*Vb)+(Dc*Vc))

Where D = Density and V = Volume for each material

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Carrera Designs, Inc.
Address City IN Zip: **4201 Eastland Drive, Elkhart, IN 46516**
Part 70 Renewal: T 039-17512-00326
Plt ID: 039-00326
Reviewer: Amy Cook
Date: July 24, 2003

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % MIBK	Weight % Toluene	Weight % Xylenes	Weight % Chromium Compounds	Weight % Glycol Ethers	Weight % Ethylbenzene	Weight % HDI	Weight % Phosphorus	Weight % Methanol	Weight % Methyl chloroform, Dichloromethane, Tetrachloroethylene or Trichlorotrifluoroethane	MEK Emissions	MIBK Emissions	Toluene Emissions	Xylenes Emissions	Chromium Compounds Emissions	Glycol Ethers Emissions	Ethylbenzene Emissions	HDI Emissions	Phosphorus Emissions	Methanol Emissions	Methyl chloroform, Dichloromethane, Tetrachloroethylene or Trichlorotrifluoroethane Emissions	Total HAP Emissions
Plant 1															(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Room A - Stack F5																										
Paint Prep																										
Reducer (4-RW6000)	7.17	0.22300	0.420	0.00%	0.00%	60.94%	2.03%	0.00%	16.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	1.79	0.06	0.00	0.49	0.00	0.00	0.00	0.00	0.00	2.34
Rooms B and C - Stacks F1, F2, F3 & F4																										
Sealer (S64)	6.86	0.18750	0.420	31.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.73	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.85
Basecoat																										
Basecoat/White Toner	10.35	0.27	0.420	1.95%	0.00%	1.12%	19.28%	0.00%	0.06%	3.38%	0.00%	0.00%	0.00%	0.00%	0.10	0.00	0.06	1.00	0.00	0.00	0.18	0.00	0.00	0.00	0.00	1.34
Reducer (4-RW6000)	7.17	0.55	0.420	0.00%	0.00%	60.94%	2.03%	0.00%	16.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	4.38	0.15	0.00	1.19	0.00	0.00	0.00	0.00	0.00	5.72
R-T-S White Basecoat																										
Basecoat/Metallic Toner	7.91	0.46	0.420	0.00%	0.00%	0.76%	29.38%	0.00%	0.41%	5.04%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.05	1.97	0.00	0.03	0.34	0.00	0.00	0.00	0.00	2.39
Reducer (4-RW6000)	7.17	0.46	0.420	0.00%	0.00%	60.94%	2.03%	0.00%	16.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	3.71	0.12	0.00	1.00	0.00	0.00	0.00	0.00	0.00	4.84
R-T-S Metallic Basecoat																										
Tints																										
Graphics/Toner	7.91	0.29	0.420	0.00%	0.00%	0.76%	29.38%	0.00%	0.41%	5.04%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.03	1.23	0.00	0.02	0.21	0.00	0.00	0.00	0.00	1.49
Reducer (4-RW6000)	7.17	0.29	0.420	0.00%	0.00%	60.94%	2.03%	0.00%	16.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	2.32	0.08	0.00	0.83	0.00	0.00	0.00	0.00	0.00	3.02
R-T-S Tint																										
Clearcoat																										
Clearcoat (CC833)	7.88	0.46	0.420	16.00%	9.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.07	0.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.67
Activator (Hardner) (MCR75)	7.20	0.12	0.420	18.00%	1.00%	0.00%	2.00%	0.00%	0.00%	0.40%	0.00%	0.00%	0.00%	0.00%	0.28	0.02	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.33
Reducer (4-RW6000)	7.17	0.17	0.420	0.00%	0.00%	60.94%	2.03%	0.00%	16.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	1.39	0.05	0.00	0.38	0.00	0.00	0.00	0.00	0.00	1.81
R-T-S Clearcoat																										
Cleaners																										
Safety-Kleen Heavy Duty (6782)	7.01	2.08600	0.250	40.00%	40.00%	60.00%	15.00%	0.00%	0.00%	50.00%	0.00%	0.00%	2.90%	1.00%	6.40	6.40	9.61	2.40	0.00	0.00	8.01	0.00	0.00	0.46	0.16	16.01
Clearcoat Gun Cleaner (4-RW6000)	7.17	0.29800	0.250	0.00%	0.00%	60.94%	2.03%	0.00%	16.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	1.43	0.05	0.00	0.39	0.00	0.00	0.00	0.00	0.00	1.86
Plant 2																										
Room A - Stacks S1 & S2																										
Paint Prep																										
Reducer (4-RW6000)	7.17	1.26540	0.420	0.00%	0.00%	60.94%	2.03%	0.00%	16.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	10.17	0.34	0.00	2.75	0.00	0.00	0.00	0.00	0.00	13.26
Primer																										
Primer (P50)	13.53	0.33	0.420	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Reducer (AS8)	7.06	0.08	0.420	0.00%	15.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.16	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.19
Hardener (UH200)	8.25	0.08	0.420	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
R-T-S Primer A																										
Etching (E2G980)	8.84	0.25	0.420	0.00%	9.00%	5.00%	4.00%	6.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.37	0.20	0.16	0.24	0.41	0.00	0.00	0.00	0.00	0.00	1.38
Reducer (R7K981)	6.76	0.25	0.420	0.00%	41.00%	0.00%	4.00%	0.00%	5.00%	0.00%	0.00%	2.00%	0.00%	0.00%	0.00	1.27	0.00	0.12	0.00	0.16	0.00	0.00	0.06	0.00	0.00	1.62
R-T-S Primer B																										
Primer C (CS105/S59) - can be used with B	11.24	0.12500	0.420	0.00%	0.00%	6.00%	9.00%	0.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.16	0.23	0.00	0.00	0.05	0.00	0.00	0.00	0.00	0.44
Room B - Stacks S3 through S13																										
Sealer (S64)	6.86	0.81250	0.420	31.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.18	0.00	0.51	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.69
Basecoat																										
Basecoat/White Toner	10.35	1.73	0.420	1.95%	0.00%	1.12%	19.28%	0.00%	0.06%	3.38%	0.00%	0.00%	0.00%	0.00%	0.64	0.00	0.37	6.34	0.00	0.02	1.11	0.00	0.00	0.00	0.00	8.48
Reducer (4-RW6000)	7.17	3.45	0.420	0.00%	0.00%	60.94%	2.03%	0.00%	16.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	27.77	0.92	0.00	7.52	0.00	0.00	0.00	0.00	0.00	36.21
R-T-S White Basecoat																										
Basecoat/Metallic Toner	7.91	3.54	0.420	0.00%	0.00%	0.76%	29.38%	0.00%	0.41%	5.04%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.39	15.13	0.00	0.21	2.60	0.00	0.00	0.00	0.00	18.32
Reducer (4-RW6000)	7.17	3.54	0.420	0.00%	0.00%	60.94%	2.03%	0.00%	16.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	28.44	0.95	0.00	7.70	0.00	0.00	0.00	0.00	0.00	37.09
R-T-S Metallic Basecoat																										
Tints																										
Graphics/Toner	7.91	2.21	0.420	0.00%	0.00%	0.76%	29.38%	0.00%	0.41%	5.04%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.24	9.45	0.00	0.13	1.62	0.00	0.00	0.00	0.00	11.45
Reducer (4-RW6000)	7.17	2.21	0.420	0.00%	0.00%	60.94%	2.03%	0.00%	16.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	17.78	0.59	0.00	4.81	0.00	0.00	0.00	0.00	0.00	23.18
R-T-S Tint																										
Clearcoat																										
Clearcoat (CC833)	7.88	2.31	0.420	16.00%	9.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.35	3.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.36
Activator (Hardner) (MCR75)	7.20	0.58	0.420	18.00%	1.00%	0.00%	2.00%	0.00%	0.00%	0.40%	0.00%	0.00%	0.00%	0.00%	1.38	0.08	0.00	0.15	0.00	0.00	0.03	0.00	0.00	0.00	0.00	1.64
Reducer (4-RW6000)	7.17	0.87	0.420	0.00%	0.00%	60.94%	2.03%	0.00%	16.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	6.96	0.23	0.00	1.88	0.00	0.00	0.00	0.00	0.00	9.07
R-T-S Clearcoat																										
Cleaners																										
Safety-Kleen Heavy Duty (6782)	7.01	2.08600	0.250	40.00%	40.00%	60.00%	15.00%	0.00%	0.00%	50.00%	0.00%	0.00%	2.90%	1.00%	6.40	6.40	9.61	2.40	0.00	0.00	8.01	0.00	0.00	0.46	0.16	16.01
Clearcoat Gun Cleaner (4-RW6000)	7.17	0.29800	0.250	0.00%	0.00%	60.94%	2.03%	0.00%	16.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	1.43	0.05	0.00	0.39	0.00	0.00	0.00	0.00	0.00	1.86
														Total (tons/yr):	25.5	18.2	96.9	35.6	0.244	21.5	20.8	0.001	0.062	0.929	0.320	184
														Total (lbs/hr):	5.83	4.14	22.1	8.12	0.056	4.91	4.75	0.0003	0.014	0.212	0.073	41.9

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
For Safety Kleen, the maximum weight percent HAPs is 100%, which is less than the sum of the maximum weight percent of each individual HAP. Therefore, the total HAPs for Safety Kleen is less than the sum of each individual HAP.
Basecoat/White Toner, Basecoat/Metallic Toner and Graphics/Toner are worst case formulations. The HAP contents of the formulations are calculated below.

HAP Contents for Basecoat/Toners

Stone White Basecoat	Weight % in Formula	Weight %Toluene	Weight % Ethylbenzene	Weight % Xylenes	Weight % MEK	Weight % Glycol Ethers	Weight % Toluene in Formula	Weight % Ethylbenzene in Formula	Weight % Xylenes in Formula	Weight % MEK in Formula	Weight % Glycol Ethers in Formula
U7026	65.02%	0.00%	3.00%	16.00%	3.00%	0.00%	0.00%	1.95%	10.40%	1.95%	0.00%
U7109	33.11%	3.00%	4.00%	25.00%	0.00%	0.00%	0.99%	1.32%	8.28%	0.00%	0.00%
U7140	0.88%	10.00%	5.00%	30.00%	0.00%	3.00%	0.09%	0.04%	0.26%	0.00%	0.03%
U7106	0.79%	4.00%	6.00%	33.00%	0.00%	3.00%	0.03%	0.05%	0.26%	0.00%	0.02%
U7133	0.13%	5.00%	7.00%	37.00%	0.00%	4.00%	0.01%	0.01%	0.05%	0.00%	0.01%
U7081	0.07%	0.00%	6.00%	36.00%	0.00%	4.00%	0.00%	0.00%	0.03%	0.00%	0.00%
Total	100%						1.12%	3.38%	19.28%	1.95%	0.06%

Metallic Basecoat/ Graphics Toner	Weight % in Formula	Weight %Toluene	Weight % Ethylbenzene	Weight % Xylenes	Weight % Glycol Ethers	Weight % Toluene in Formula	Weight % Ethylbenzene in Formula	Weight % Xylenes in Formula	Weight % Glycol Ethers in Formula
U7023	84.34%	0.00%	5.00%	29.00%	0.00%	0.00%	4.22%	24.46%	0.00%
U7134	8.86%	3.00%	6.00%	37.00%	4.00%	0.27%	0.53%	3.28%	0.35%
t1f271	4.32%	11.00%	3.00%	17.00%	0.00%	0.48%	0.13%	0.73%	0.00%
U7122	1.38%	0.00%	6.00%	35.00%	1.00%	0.00%	0.08%	0.48%	0.01%
U7118	1.11%	2.00%	7.00%	38.00%	4.00%	0.02%	0.08%	0.42%	0.04%
Total	100%					0.76%	5.04%	29.38%	0.41%

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Emission Units

Company Name: Carrera Designs, Inc.
Address City IN Zip: 4201 Eastland Drive, Elkhart, IN 46516
Part 70 Renewal: T 039-17512-00326
Plt ID: 039-00326
Reviewer: Amy Cook
Date: July 24, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
15.07	132.01

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in lbs/hr	0.029	0.115	0.009	1.507	0.083	1.266
Potential Emission in tons/yr	0.125	0.502	0.040	6.60	0.363	5.54

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included)
See page 4 for HAPs emissions calculations.

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HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.0021	0.0012	0.0750	1.8000	0.0034
Potential Emission in lbs/hr	3.16E-05	1.81E-05	1.13E-03	2.71E-02	5.12E-05
Potential Emission in tons/yr	0.0001	0.0001	0.0050	0.1188	0.0002

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.00038	0.0021	HAPs
Potential Emission in lbs/hr	7.54E-06	1.66E-05	2.11E-05	5.73E-06	3.16E-05	0.028
Potential Emission in tons/yr	0.00003	0.0001	0.0001	0.00003	0.0001	0.125

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.